

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)</b>

**PLAINTIFFS' NOTICE OF DAUBERT MOTION TO EXCLUDE THE  
TESTIMONY OF DEFENSE EXPERT GEORGE JOHNSON, Ph.D.**

**TO:** Seth A. Goldberg, Esq.  
Duane Morris LLP  
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Philadelphia, Pennsylvania 19103-4196  
*Attorneys for Defendants*

**PLEASE TAKE NOTICE** that pursuant to Case Management No. 23 Revised, Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4<sup>th</sup> and Cooper Streets, Camden, New Jersey, for an Order Excluding the Testimony of George Johnson, Ph.D.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs shall rely upon the Brief and Certification of Rosemarie Riddell Bogdan in support of the Motion.

**PLEASE TAKE FURTHER NOTICE** that plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

**MARTIN, HARDING & MAZZOTTI, LLP**  
Attorneys for Plaintiffs

By: /s/Rosemarie Riddell Bogdan

Dated: November 1, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2021, I electronically filed the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

**MARTIN, HARDING & MAZZOTTI, LLP**  
Attorneys for Plaintiffs

By: /s Rosemarie Riddell Bogdan

Dated: November 1, 2021